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Attorneys for Defendants Umer Wasim and TeknobyL Digital LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

AMAZON.COM, INC., a Delaware  
corporation, and AMAZON  
TECHNOLOGIES, INC., a Nevada  
corporation;

Plaintiffs

vs.

UMER WASIM, et al.,

Defendants.

CASE NO. 4:23-cv-05580-DMR

**DEFENDANTS UMER WASIM AND  
TEKNOBYL DIGITAL LLC'S  
ANSWER AND AFFIRMATIVE  
DEFENSES; DEMAND FOR JURY  
TRIAL**

1 Defendants Umer Wasim and Teknoby1 Digital LLC (“Defendants”) in response to  
2 Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc. (“Plaintiffs”) Complaint,  
3 alleges, deny, and avers as follows:

4  
5 **INTRODUCTION**

6 1. Defendants deny the allegations of Paragraph 1.

7 2. Defendants lack knowledge and information sufficient to form a belief as to  
8 the truth of the allegations set forth in Paragraph 2 and, therefore, deny the same.

9 3. Defendants deny the allegations of Paragraph 3.

10  
11 **PARTIES**

12 4. Defendants lack knowledge and information sufficient to form a belief as to  
13 the truth of the allegations set forth in Paragraph 4 and, therefore, deny the same.

14 5. Defendants lack knowledge and information sufficient to form a belief as to  
15 the truth of the allegations set forth in Paragraph 5 and, therefore, deny the same.

16 6. Defendants admit the allegations of Paragraph 6.

17 7. Defendants admit the allegations of Paragraph 7.

18 8. Defendants lack knowledge and information sufficient to form a belief as to  
19 the truth of the allegations set forth in Paragraph 8 and, therefore, deny the same.

20 9. Defendants lack knowledge and information sufficient to form a belief as to  
21 the truth of the allegations set forth in Paragraph 9 and, therefore, deny the same.

22 10. Defendants lack knowledge and information sufficient to form a belief as to  
23 the truth of the allegations set forth in Paragraph 10 and, therefore, deny the same.

24 11. Defendants lack knowledge and information sufficient to form a belief as to  
25 the truth of the allegations set forth in Paragraph 11 and, therefore, deny the same.

26 12. Defendants lack knowledge and information sufficient to form a belief as to  
27 the truth of the allegations set forth in Paragraph 12 and, therefore, deny the same.

28 13. Defendants lack knowledge and information sufficient to form a belief as to

1 the truth of the allegations set forth in Paragraph 13 and, therefore, deny the same.

2 14. Defendants lack knowledge and information sufficient to form a belief as to  
3 the truth of the allegations set forth in Paragraph 14 and, therefore, deny the same.

4 15. Defendants lack knowledge and information sufficient to form a belief as to  
5 the truth of the allegations set forth in Paragraph 15 and, therefore, deny the same.

6 16. Defendants lack knowledge and information sufficient to form a belief as to  
7 the truth of the allegations set forth in Paragraph 16 and, therefore, deny the same.

8 17. Defendants lack knowledge and information sufficient to form a belief as to  
9 the truth of the allegations set forth in Paragraph 17 and, therefore, deny the same.

10 18. Defendants lack knowledge and information sufficient to form a belief as to  
11 the truth of the allegations set forth in Paragraph 18 and, therefore, deny the same.

12 19. Defendants lack knowledge and information sufficient to form a belief as to  
13 the truth of the allegations set forth in Paragraph 19 and, therefore, deny the same.

14 20. Defendants lack knowledge and information sufficient to form a belief as to  
15 the truth of the allegations set forth in Paragraph 20 and, therefore, deny the same.

16 21. Defendants lack knowledge and information sufficient to form a belief as to  
17 the truth of the allegations set forth in Paragraph 21 and, therefore, deny the same.

18 22. Defendants lack knowledge and information sufficient to form a belief as to  
19 the truth of the allegations set forth in Paragraph 22 and, therefore, deny the same.

20 23. Defendants lack knowledge and information sufficient to form a belief as to  
21 the truth of the allegations set forth in Paragraph 23 and, therefore, deny the same.

22 24. Defendants lack knowledge and information sufficient to form a belief as to  
23 the truth of the allegations set forth in Paragraph 24 and, therefore, deny the same.

24  
25 **JURISDICTION**

26 25. Defendants admit the allegations of Paragraph 25.

27 26. Defendants admit that the Court has subject matter jurisdiction, but deny the  
28 remaining allegations of Paragraph 26.



1 the truth of the allegations set forth in Paragraph 39 and, therefore, deny the same.

2 40. Defendants deny the allegations in Paragraph 40.

3 41. Defendants lack knowledge and information sufficient to form a belief as to  
4 the truth of the allegations set forth in Paragraph 41 and, therefore, deny the same.

5 42. Defendants lack knowledge and information sufficient to form a belief as to  
6 the truth of the allegations set forth in Paragraph 42 and, therefore, deny the same.

7 43. Defendants lack knowledge and information sufficient to form a belief as to  
8 the truth of the allegations set forth in Paragraph 43 and, therefore, deny the same.

9 44. Defendants lack knowledge and information sufficient to form a belief as to  
10 the truth of the allegations set forth in Paragraph 44 and, therefore, deny the same.

11 45. Defendants lack knowledge and information sufficient to form a belief as to  
12 the truth of the allegations set forth in Paragraph 45 and, therefore, deny the same.

13 46. Defendants lack knowledge and information sufficient to form a belief as to  
14 the truth of the allegations set forth in Paragraph 46 and, therefore, deny the same.

15 47. Defendants lack knowledge and information sufficient to form a belief as to  
16 the truth of the allegations set forth in Paragraph 47 and, therefore, deny the same.

17 48. Defendants lack knowledge and information sufficient to form a belief as to  
18 the truth of the allegations set forth in Paragraph 48 and, therefore, deny the same.

19 49. Defendants lack knowledge and information sufficient to form a belief as to  
20 the truth of the allegations set forth in Paragraph 49 and, therefore, deny the same.

21 50. Defendants lack knowledge and information sufficient to form a belief as to  
22 the truth of the allegations set forth in Paragraph 50 and, therefore, deny the same.

23 51. Defendants lack knowledge and information sufficient to form a belief as to  
24 the truth of the allegations set forth in Paragraph 51 and, therefore, deny the same.

25 52. Defendants lack knowledge and information sufficient to form a belief as to  
26 the truth of the allegations set forth in Paragraph 52 and, therefore, deny the same.

27 53. Defendants lack knowledge and information sufficient to form a belief as to  
28 the truth of the allegations set forth in Paragraph 53 and, therefore, deny the same.

1           54. Defendants lack knowledge and information sufficient to form a belief as to  
2 the truth of the allegations set forth in Paragraph 54 and, therefore, deny the same.

3           55. Defendants lack knowledge and information sufficient to form a belief as to  
4 the truth of the allegations set forth in Paragraph 55 and, therefore, deny the same.

5           56. Defendants lack knowledge and information sufficient to form a belief as to  
6 the truth of the allegations set forth in Paragraph 56 and, therefore, deny the same.

7           57. Defendants lack knowledge and information sufficient to form a belief as to  
8 the truth of the allegations set forth in Paragraph 57 and, therefore, deny the same.

9           58. Defendants lack knowledge and information sufficient to form a belief as to  
10 the truth of the allegations set forth in Paragraph 58 and, therefore, deny the same.

11           59. Defendants lack knowledge and information sufficient to form a belief as to  
12 the truth of the allegations set forth in Paragraph 59 and, therefore, deny the same.

13           60. Defendants lack knowledge and information sufficient to form a belief as to  
14 the truth of the allegations set forth in Paragraph 60 and, therefore, deny the same.

15           61. Defendants lack knowledge and information sufficient to form a belief as to  
16 the truth of the allegations set forth in Paragraph 61 and, therefore, deny the same.

17           62. Defendants lack knowledge and information sufficient to form a belief as to  
18 the truth of the allegations set forth in Paragraph 62 and, therefore, deny the same.

19           63. Defendants lack knowledge and information sufficient to form a belief as to  
20 the truth of the allegations set forth in Paragraph 63 and, therefore, deny the same.

21           64. Defendants lack knowledge and information sufficient to form a belief as to  
22 the truth of the allegations set forth in Paragraph 64 and, therefore, deny the same.

23           65. Defendants lack knowledge and information sufficient to form a belief as to  
24 the truth of the allegations set forth in Paragraph 65 and, therefore, deny the same.

25           66. Defendants lack knowledge and information sufficient to form a belief as to  
26 the truth of the allegations set forth in Paragraph 66 and, therefore, deny the same.

27           67. Defendants lack knowledge and information sufficient to form a belief as to  
28 the truth of the allegations set forth in Paragraph 67 and, therefore, deny the same.

1           68. Defendants lack knowledge and information sufficient to form a belief as to  
2 the truth of the allegations set forth in Paragraph 68 and, therefore, deny the same.

3           69. Defendants lack knowledge and information sufficient to form a belief as to  
4 the truth of the allegations set forth in Paragraph 69 and, therefore, deny the same.

5           70. Defendants lack knowledge and information sufficient to form a belief as to  
6 the truth of the allegations set forth in Paragraph 70 and, therefore, deny the same.

7           71. Defendants lack knowledge and information sufficient to form a belief as to  
8 the truth of the allegations set forth in Paragraph 71 and, therefore, deny the same.

9           72. Defendants lack knowledge and information sufficient to form a belief as to  
10 the truth of the allegations set forth in Paragraph 72 and, therefore, deny the same.

11           73. Defendants lack knowledge and information sufficient to form a belief as to  
12 the truth of the allegations set forth in Paragraph 73 and, therefore, deny the same.

13           74. Defendants lack knowledge and information sufficient to form a belief as to  
14 the truth of the allegations set forth in Paragraph 74 and, therefore, deny the same.

15           75. Defendants lack knowledge and information sufficient to form a belief as to  
16 the truth of the allegations set forth in Paragraph 75 and, therefore, deny the same.

17           76. Defendants lack knowledge and information sufficient to form a belief as to  
18 the truth of the allegations set forth in Paragraph 76 and, therefore, deny the same.

19           77. Defendants lack knowledge and information sufficient to form a belief as to  
20 the truth of the allegations set forth in Paragraph 77 and, therefore, deny the same.

21           78. Defendants lack knowledge and information sufficient to form a belief as to  
22 the truth of the allegations set forth in Paragraph 78 and, therefore, deny the same.

23           79. Defendants lack knowledge and information sufficient to form a belief as to  
24 the truth of the allegations set forth in Paragraph 79 and, therefore, deny the same.

25           80. Defendants lack knowledge and information sufficient to form a belief as to  
26 the truth of the allegations set forth in Paragraph 80 and, therefore, deny the same.

27           81. Defendants lack knowledge and information sufficient to form a belief as to  
28 the truth of the allegations set forth in Paragraph 81 and, therefore, deny the same.



1           82. Defendants lack knowledge and information sufficient to form a belief as to  
2 the truth of the allegations set forth in Paragraph 82 and, therefore, deny the same.

3           83. Defendants lack knowledge and information sufficient to form a belief as to  
4 the truth of the allegations set forth in Paragraph 83 and, therefore, deny the same.

5           84. Defendants lack knowledge and information sufficient to form a belief as to  
6 the truth of the allegations set forth in Paragraph 84 and, therefore, deny the same.

7           85. Defendants lack knowledge and information sufficient to form a belief as to  
8 the truth of the allegations set forth in Paragraph 85 and, therefore, deny the same.

9           86. Defendants lack knowledge and information sufficient to form a belief as to  
10 the truth of the allegations set forth in Paragraph 86 and, therefore, deny the same.

11           87. Defendants lack knowledge and information sufficient to form a belief as to  
12 the truth of the allegations set forth in Paragraph 87 and, therefore, deny the same.

13           88. Defendants lack knowledge and information sufficient to form a belief as to  
14 the truth of the allegations set forth in Paragraph 88 and, therefore, deny the same.

15           89. Defendants lack knowledge and information sufficient to form a belief as to  
16 the truth of the allegations set forth in Paragraph 89 and, therefore, deny the same.

17           90. Defendants lack knowledge and information sufficient to form a belief as to  
18 the truth of the allegations set forth in Paragraph 90 and, therefore, deny the same.

19           91. Defendants lack knowledge and information sufficient to form a belief as to  
20 the truth of the allegations set forth in Paragraph 91 and, therefore, deny the same.

21           92. Defendants lack knowledge and information sufficient to form a belief as to  
22 the truth of the allegations set forth in Paragraph 92 and, therefore, deny the same.

23           93. Defendants lack knowledge and information sufficient to form a belief as to  
24 the truth of the allegations set forth in Paragraph 93 and, therefore, deny the same.

25           94. Defendants lack knowledge and information sufficient to form a belief as to  
26 the truth of the allegations set forth in Paragraph 94 and, therefore, deny the same.

27           95. Defendants lack knowledge and information sufficient to form a belief as to  
28 the truth of the allegations set forth in Paragraph 95 and, therefore, deny the same.



1           96. Defendants lack knowledge and information sufficient to form a belief as to  
2 the truth of the allegations set forth in Paragraph 96 and, therefore, deny the same.

3           97. Defendants lack knowledge and information sufficient to form a belief as to  
4 the truth of the allegations set forth in Paragraph 97 and, therefore, deny the same.

5           98. Defendants lack knowledge and information sufficient to form a belief as to  
6 the truth of the allegations set forth in Paragraph 98 and, therefore, deny the same.

7           99. Defendants lack knowledge and information sufficient to form a belief as to  
8 the truth of the allegations set forth in Paragraph 99 and, therefore, deny the same.

9           100. Defendants lack knowledge and information sufficient to form a belief as to  
10 the truth of the allegations set forth in Paragraph 100 and, therefore, deny the same.

11           101. Defendants lack knowledge and information sufficient to form a belief as to  
12 the truth of the allegations set forth in Paragraph 101 and, therefore, deny the same.

13           102. Defendants lack knowledge and information sufficient to form a belief as to  
14 the truth of the allegations set forth in Paragraph 102 and, therefore, deny the same.

15           103. Defendants lack knowledge and information sufficient to form a belief as to  
16 the truth of the allegations set forth in Paragraph 103 and, therefore, deny the same.

17           104. Defendants lack knowledge and information sufficient to form a belief as to  
18 the truth of the allegations set forth in Paragraph 104 and, therefore, deny the same.

19           105. Defendants lack knowledge and information sufficient to form a belief as to  
20 the truth of the allegations set forth in Paragraph 105 and, therefore, deny the same.

21           106. Defendants lack knowledge and information sufficient to form a belief as to  
22 the truth of the allegations set forth in Paragraph 106 and, therefore, deny the same.

23           107. Defendants lack knowledge and information sufficient to form a belief as to  
24 the truth of the allegations set forth in Paragraph 107 and, therefore, deny the same.

25           108. Defendants lack knowledge and information sufficient to form a belief as to  
26 the truth of the allegations set forth in Paragraph 108 and, therefore, deny the same.

27           109. Defendants lack knowledge and information sufficient to form a belief as to  
28 the truth of the allegations set forth in Paragraph 109 and, therefore, deny the same.

1 110. Defendants lack knowledge and information sufficient to form a belief as to  
2 the truth of the allegations set forth in Paragraph 110 and, therefore, deny the same.

3 111. Defendants lack knowledge and information sufficient to form a belief as to  
4 the truth of the allegations set forth in Paragraph 111 and, therefore, deny the same.

5 112. Defendants lack knowledge and information sufficient to form a belief as to  
6 the truth of the allegations set forth in Paragraph 112 and, therefore, deny the same.

7 113. Defendants lack knowledge and information sufficient to form a belief as to  
8 the truth of the allegations set forth in Paragraph 113 and, therefore, deny the same.

9 114. Defendants lack knowledge and information sufficient to form a belief as to  
10 the truth of the allegations set forth in Paragraph 114 and, therefore, deny the same.

11 115. Defendants lack knowledge and information sufficient to form a belief as to  
12 the truth of the allegations set forth in Paragraph 115 and, therefore, deny the same.

13 116. Defendants lack knowledge and information sufficient to form a belief as to  
14 the truth of the allegations set forth in Paragraph 116 and, therefore, deny the same.

15 117. Defendants lack knowledge and information sufficient to form a belief as to  
16 the truth of the allegations set forth in Paragraph 117 and, therefore, deny the same.

17 118. Defendants lack knowledge and information sufficient to form a belief as to  
18 the truth of the allegations set forth in Paragraph 118 and, therefore, deny the same.

19 119. Defendants lack knowledge and information sufficient to form a belief as to  
20 the truth of the allegations set forth in Paragraph 119 and, therefore, deny the same.

21 120. Defendants lack knowledge and information sufficient to form a belief as to  
22 the truth of the allegations set forth in Paragraph 120 and, therefore, deny the same.

23 121. Defendants lack knowledge and information sufficient to form a belief as to  
24 the truth of the allegations set forth in Paragraph 121 and, therefore, deny the same.

25  
26 **FIRST CAUSE OF ACTION**

27 **Trademark Infringement (15 U.S.C. § 1114)**

28 **By Amazon Technologies**

1 122. Defendants repeat and incorporate by reference herein their responses to  
2 Paragraphs 1 through 121.

3 123. Defendants deny the allegations set forth in Paragraph 123.

4 124. Defendants lack knowledge and information sufficient to form a belief as to  
5 the truth of the allegations set forth in Paragraph 124 and, therefore, deny the same.

6 125. Defendants lack knowledge and information sufficient to form a belief as to  
7 the truth of the allegations set forth in Paragraph 125 and, therefore, deny the same.

8 126. Defendants deny the allegations set forth in Paragraph 126.

9 127. Defendants deny the allegations set forth in Paragraph 127.

10 128. Defendants deny the allegations set forth in Paragraph 128.

11 129. Defendants deny the allegations set forth in Paragraph 129.

12 130. Defendants deny the allegations set forth in Paragraph 130.

13 131. Defendants deny the allegations set forth in Paragraph 131.

14  
15 **SECOND CAUSE OF ACTION**

16 **False Affiliation and Designation of Origin (15 U.S.C. § 1125(a))**

17 **By All Plaintiffs**

18 132. Defendants repeat and incorporate by reference herein their responses to  
19 Paragraphs 1 through 131.

20 133. Defendants lack knowledge and information sufficient to form a belief as to  
21 the truth of the allegations set forth in Paragraph 133 and, therefore, deny the same.

22 134. Defendants lack knowledge and information sufficient to form a belief as to  
23 the truth of the allegations set forth in Paragraph 134 and, therefore, deny the same.

24 135. Defendants lack knowledge and information sufficient to form a belief as to  
25 the truth of the allegations set forth in Paragraph 135 and, therefore, deny the same.

26 136. Defendants deny the allegations set forth in Paragraph 136.

27 137. Defendants deny the allegations set forth in Paragraph 137.

28 138. Defendants deny the allegations set forth in Paragraph 138.

1 139. Defendants deny the allegations set forth in Paragraph 139.

2 140. Defendants deny the allegations set forth in Paragraph 140.

3 141. Defendants deny the allegations set forth in Paragraph 141.

4  
5 **THIRD CAUSE OF ACTION**

6 **Trademark Dilution (15 U.S.C. § 1125(c))**

7 **By Amazon Technologies**

8 142. Defendants repeat and incorporate by reference herein their responses to  
9 Paragraphs 1 through 141.

10 143. Defendants lack knowledge and information sufficient to form a belief as to  
11 the truth of the allegations set forth in Paragraph 143 and, therefore, deny the same.

12 144. Defendants deny the allegations set forth in Paragraph 144.

13 145. Defendants deny the allegations set forth in Paragraph 145.

14 146. Defendants deny the allegations set forth in Paragraph 146.

15  
16 **FOURTH CAUSE OF ACTION**

17 **Cybersquatting (15 U.S.C. § 1125(d))**

18 **By Amazon Technologies**

19 147. Defendants repeat and incorporate by reference herein their responses to  
20 Paragraphs 1 through 146.

21 148. Defendants lack knowledge and information sufficient to form a belief as to  
22 the truth of the allegations set forth in Paragraph 148 and, therefore, deny the same.

23 149. Defendants deny the allegations set forth in Paragraph 149.

24 150. Defendants deny the allegations set forth in Paragraph 150.

25 151. Defendants lack knowledge and information sufficient to form a belief as to  
26 the truth of the allegations set forth in Paragraph 151 and, therefore, deny the same.

27 152. Defendants deny the allegations set forth in Paragraph 152.

28 153. Defendants deny the allegations set forth in Paragraph 153.

1 154. Defendants deny the allegations set forth in Paragraph 154.

2  
3 **AFFIRMATIVE DEFENSES**

4 By asserting the following Affirmative Defenses, Defendants do not alter  
5 Plaintiffs' burden of proof. There may be defenses to Plaintiffs' causes of action that are  
6 currently unknown to Defendants. Defendants therefore reserve the right to amend this  
7 Answer to allege additional defenses should discovery indicate that they are appropriate.  
8 However, Defendants allege, upon current information and belief, the following  
9 Affirmative Defenses:

10  
11 **FIRST AFFIRMATIVE DEFENSE**

12 **(Transformative Use)**

13 Defendants' conduct constitutes transformative use.

14  
15 **SECOND AFFIRMATIVE DEFENSE**

16 **(Acts of Third Parties)**

17 Plaintiffs' damages, if any, resulted from the acts or omissions of co-defendants or  
18 third parties over whom Defendants had no control or responsibility. The acts of such  
19 third parties and/or co-defendants constitute intervening or superseding causes of the  
20 harm, if any, suffered by Plaintiffs.

21  
22 **RESERVATION OF RIGHTS**

23 Defendants allege that they have not knowingly or voluntarily waived any  
24 applicable affirmative defenses and reserve the right to assert and rely on such other  
25 applicable affirmative defenses as may become available or apparent during discovery  
26 proceedings. Defendants further reserve the right to amend their answer and/or  
27 affirmative defenses accordingly and/or to declare affirmative defenses that they  
28 determine are not applicable during the course of subsequent discovery.

**PRAYER FOR RELIEF**

WHEREFORE, Defendants pray for judgment against Plaintiffs as follows:

A. The dismissal of Plaintiffs' Complaint against Defendants, in its entirety, and with prejudice;

B. An award to Defendants of their reasonable attorneys' fees and costs incurred in connection with this action; and

C. Such other and further relief as the Court may deem just and proper.

Respectfully submitted:

Dated: March 8, 2024

**MILORD LAW GROUP, P.C.**

/s/ Milord A. Keshishian

Milord A. Keshishian

Attorneys for Defendants

UMER WASIM AND TEKNOBYL

DIGITAL LLC